

1  
2  
3  
4  
5  
6 UNITED STATES DISTRICT COURT  
7 DISTRICT OF NEVADA

8 THE NECK HAMMOCK, INC. )

Case #2:20-cv-00222-NJK

9 )  
10 Plaintiff(s), )

11 vs. )

12 DFO Global Performance Commerce Ltd., )  
13 et al., )

14 Defendant(s). )

**VERIFIED PETITION FOR  
PERMISSION TO PRACTICE  
IN THIS CASE ONLY BY  
ATTORNEY NOT ADMITTED  
TO THE BAR OF THIS COURT  
AND DESIGNATION OF  
LOCAL COUNSEL**

FILING FEE IS \$250.00

15  
16 Brian N. Platt, Petitioner, respectfully represents to the Court:  
(name of petitioner)

17 1. That Petitioner is an attorney at law and a member of the law firm of

18 Workman Nydegger

19 (firm name)

20 with offices at 60 E. South Temple St., Ste 1000  
(street address)

21 Salt Lake City, Utah, 84111  
(city) (state) (zip code)

22 (801) 533-9800, bplatt@wnlaw.com  
(area code + telephone number) (Email address)

23  
24 2. That Petitioner has been retained personally or as a member of the law firm by

25 The Neck hammock, Inc. to provide legal representation in connection with  
26 [client(s)]

27 the above-entitled case now pending before this Court.  
28

3. That since 05/14/2019, Petitioner has been and presently is a  
 (date)  
 member in good standing of the bar of the highest Court of the State of Utah  
 (state)  
 where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or  
 from the clerk of the supreme court or highest admitting court of each state, territory, or insular  
 possession of the United States in which the applicant has been admitted to practice law certifying  
 the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District  
 Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts  
 of other States on the dates indicated for each, and that Petitioner is presently a member in good  
 standing of the bars of said Courts.

Court	Date Admitted	Bar Number
U.S. District Court, District of Utah	05/14/2019	N/A (1)
U.S. District Court, District of Colorado	11/07/2019	N/A (1)
U.S. District Court, District of Washington	12/04/2003	N/A (1)
Utah State Bar	05/14/2019	17099
Washington State Bar	12/04/2003	34089

5. That there are or have been no disciplinary proceedings instituted against petitioner,  
 nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory  
 or administrative body, or any resignation or termination in order to avoid disciplinary or  
 disbarment proceedings, except as described in detail below:

NONE

(1) The district courts of Utah, Colorado and Washington do not issue bar numbers.

6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give particulars if ever denied admission):

NONE

7. That Petitioner is a member of good standing in the following Bar Associations.

Utah State Bar  
Washington State Bar

8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied	
NONE			Denied	<input type="button" value="v"/>
			Denied	<input type="button" value="v"/>
			Denied	<input type="button" value="v"/>
			Denied	<input type="button" value="v"/>
			Denied	<input type="button" value="v"/>

(If necessary, please attach a statement of additional applications)

9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

10. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.

11. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.

1 That Petitioner respectfully prays that Petitioner be admitted to practice before this Court  
 2 FOR THE PURPOSES OF THIS CASE ONLY.

3  
 4 STATE OF UTAH )  
 5 COUNTY OF SALT )  
 6

Brian N. Platt  
 Petitioner's signature

7 BRIAN N. PLATT, Petitioner, being first duly sworn, deposes and says:

8 That the foregoing statements are true.

Brian N. Platt  
 Petitioner's signature

9  
 10 Subscribed and sworn to before me this

11 10TH day of FEBRUARY, 2020.

12 Susan C. Held  
 13 Notary Public or Clerk of Court



14  
 15  
 16 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO**  
 17 **THE BAR OF THIS COURT AND CONSENT THERETO.**

18 Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner  
 19 believes it to be in the best interests of the client(s) to designate Jessica M. Lujan,  
 20 (name of local counsel)  
 21 Attorney at Law, member of the State of Nevada and previously admitted to practice before the  
 22 above-entitled Court as associate resident counsel in this action. The address and email address of  
 23 said designated Nevada counsel is:

24 400 S. Fourth St., Third Floor,  
 25 (street address)  
 26 Las Vegas, Nevada, 89101,  
 27 (city) (state) (zip code)  
 28 (702) 791-0308, jlujan@nevadafirm.com,  
 (area code + telephone number) (Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes  
2 agreement and authorization for the designated resident admitted counsel to sign stipulations  
3 binding on all of us.

4  
5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6  
7 The undersigned party(ies) appoint(s) Jessica M. Lujan as  
8 his/her/their Designated Resident Nevada Counsel in this case.  
(name of local counsel)

9  
10   
11 (party's signature)

12 Steven Sedell, President  
13 (type or print party name, title)

14 (party's signature)

15 (type or print party name, title)

16  
17 **CONSENT OF DESIGNEE**

18 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

19  
20 Designated Resident Nevada Counsel's signature

21 Bar number

22 Email address

23 APPROVED:

24 Dated: this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

25  
26 UNITED STATES DISTRICT JUDGE

AO 136

**CERTIFICATE OF GOOD STANDING**

**UNITED STATES DISTRICT COURT**

District of Utah

I, D. Mark Jones, Clerk of the United States District Court, District of Utah, certify that

**Brian N. Platt**


Bar # **17099**, was duly admitted to practice in this Court on May 14, 2019, and is in good standing as a member of the bar of this Court.

Dated at Salt Lake City, Utah  
on January 9, 2020



D. Mark Jones

*Clerk*

  
(By) Deputy Clerk



# **Certificate of Good Standing and No Disciplinary History**

United States District Court  
District of Colorado

I, Jeffrey P. Colwell, Clerk of the United States District Court  
DO HEREBY CERTIFY

**BRIAN N PLATT**

was admitted to practice in this court on  
November 7, 2019  
and is in good standing with no disciplinary history.

Dated: February 4, 2020

---

Jeffrey P. Colwell, Clerk

# United States District Court

## Western District of Washington

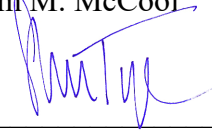


### CERTIFICATE OF GOOD STANDING

I, William M. McCool, Clerk of the United States District Court for the Western District of Washington, do hereby certify that BRIAN NELSON PLATT was admitted to practice in said Court on December 4, 2003 to the Western District of Washington, and is in good standing as a member of the bar of said Court.

Dated at Seattle, Washington on January 4, 2020.

William M. McCool  
Clerk

By   
Deputy Clerk





# ***CERTIFICATE OF GOOD STANDING***

\*This document expires 60 days from the date of issuance\*

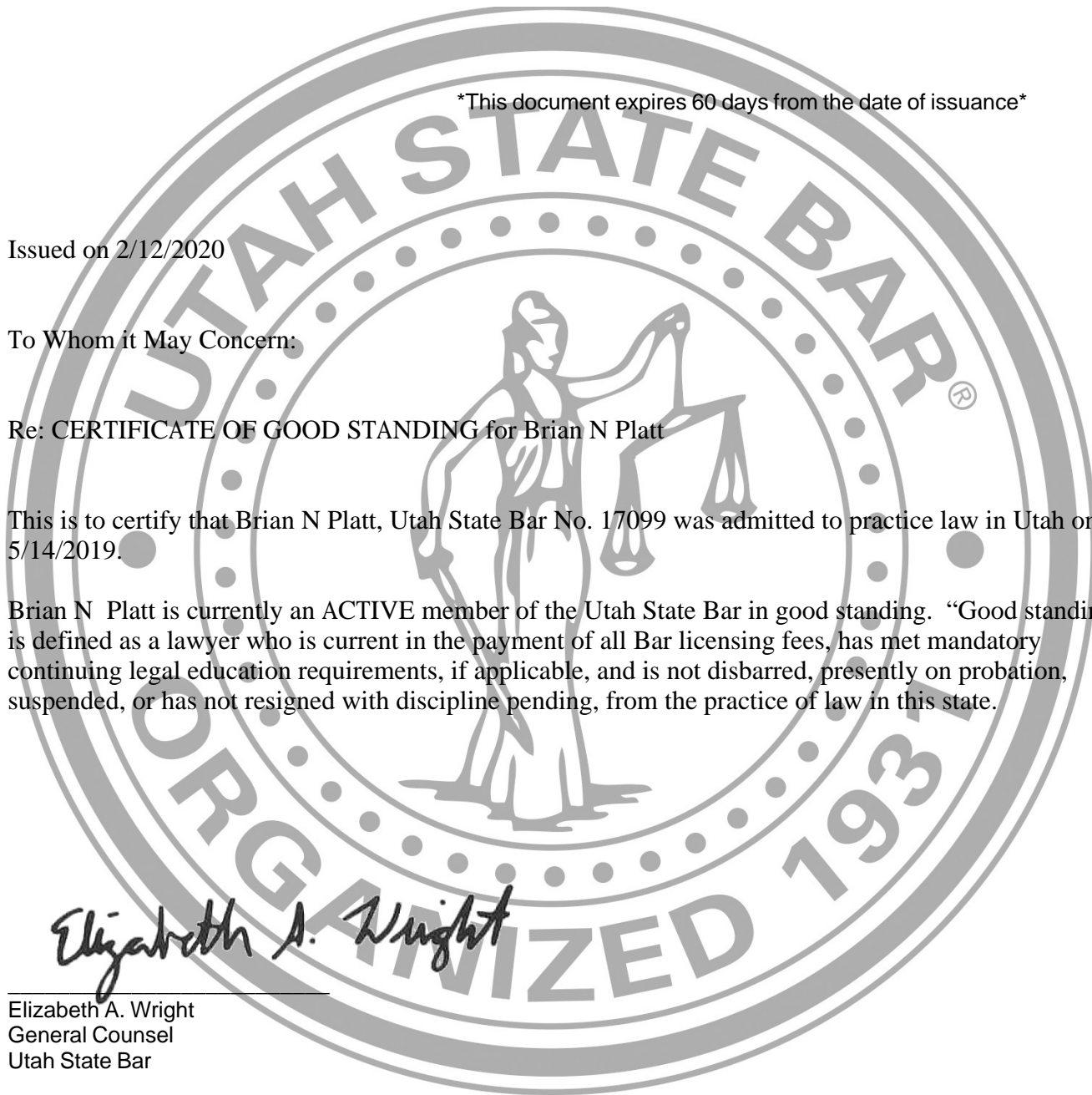
Issued on 2/12/2020

To Whom it May Concern:

Re: CERTIFICATE OF GOOD STANDING for Brian N Platt

This is to certify that Brian N Platt, Utah State Bar No. 17099 was admitted to practice law in Utah on 5/14/2019.

Brian N Platt is currently an ACTIVE member of the Utah State Bar in good standing. "Good standing" is defined as a lawyer who is current in the payment of all Bar licensing fees, has met mandatory continuing legal education requirements, if applicable, and is not disbarred, presently on probation, suspended, or has not resigned with discipline pending, from the practice of law in this state.



*Elizabeth A. Wright*

Elizabeth A. Wright  
General Counsel  
Utah State Bar

# CERTIFICATION OF CURRENT STATUS

February 21, 2020

## TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the Washington State Bar Association, **Mr. Brian Nelson Platt**, license no. **34089** was licensed or admitted to the practice of law as a lawyer in this state by the Washington Supreme Court on **November 6, 2003** and is, as of the date of this certificate, a(n) **Active lawyer** of the Washington State Bar Association who is **Eligible** to practice law in this state as a lawyer.

This certificate reflects the date of admission or licensure and the license status as of the date stated. Historical information about status, including periods on inactive status, administrative and disciplinary suspensions, disbarments, resignations, etc., are not reflected in this information, but are available through a Status History Certificate. A summary of confidential grievances and public discipline imposed is available, if authorized by the member, through a Discipline History Certificate.



---

Terra Nevitt  
Interim Executive Director

Washington State Bar Association  
1325 Fourth Ave, Suite 600  
Seattle, WA 98101-2539  
206-443-WSBA

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

THE NECK HAMMOCK, INC.

Case # 2:20-cv-00222-RCJ-NJK

Plaintiff(s),

vs.

DFO Global Performance Commerce Ltd.,  
et al.,

Defendant(s).

**VERIFIED PETITION FOR  
PERMISSION TO PRACTICE  
IN THIS CASE ONLY BY  
ATTORNEY NOT ADMITTED  
TO THE BAR OF THIS COURT  
AND DESIGNATION OF  
LOCAL COUNSEL**

FILING FEE IS \$250.00

Brian N. Platt, Petitioner, respectfully represents to the Court:  
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of

Workman Nydegger

(firm name)

with offices at 60 E. South Temple St., Ste 1000,  
(street address)

Salt Lake City, Utah, 84111,  
(city) (state) (zip code)

(801) 533-9800, bplatt@wnlaw.com.  
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by

The Neck hammock, Inc. to provide legal representation in connection with  
[client(s)]

the above-entitled case now pending before this Court.

3. That since 05/14/2019, Petitioner has been and presently is a  
 (date)  
 member in good standing of the bar of the highest Court of the State of Utah  
 (state)  
 where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or  
 from the clerk of the supreme court or highest admitting court of each state, territory, or insular  
 possession of the United States in which the applicant has been admitted to practice law certifying  
 the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District  
 Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts  
 of other States on the dates indicated for each, and that Petitioner is presently a member in good  
 standing of the bars of said Courts.

Court	Date Admitted	Bar Number
U.S. District Court, District of Utah	05/14/2019	N/A (1)
U.S. District Court, District of Colorado	11/07/2019	N/A (1)
U.S. District Court, District of Washington	12/04/2003	N/A (1)
Utah State Bar	05/14/2019	17099
Washington State Bar	12/04/2003	34089

5. That there are or have been no disciplinary proceedings instituted against petitioner,  
 nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory  
 or administrative body, or any resignation or termination in order to avoid disciplinary or  
 disbarment proceedings, except as described in detail below:

NONE

(1) The district courts of Utah, Colorado and Washington do not issue bar numbers.

6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give particulars if ever denied admission):

NONE

7. That Petitioner is a member of good standing in the following Bar Associations.

Utah State Bar  
Washington State Bar

8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied	
NONE			Denied	<input type="button" value="v"/>
			Denied	<input type="button" value="v"/>
			Denied	<input type="button" value="v"/>
			Denied	<input type="button" value="v"/>
			Denied	<input type="button" value="v"/>

(If necessary, please attach a statement of additional applications)

9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

10. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.

11. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.

That Petitioner respectfully prays that Petitioner be admitted to practice before this Court  
FOR THE PURPOSES OF THIS CASE ONLY.

STATE OF UTAH )  
COUNTY OF SALT )

[Signature]  
Petitioner's signature

BRIAN N. PLATT, Petitioner, being first duly sworn, deposes and says:

That the foregoing statements are true.

[Signature]  
Petitioner's signature

Subscribed and sworn to before me this

10TH day of FEBRUARY, 2020.

[Signature]  
Notary Public or Clerk of Court



**DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO  
THE BAR OF THIS COURT AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner believes it to be in the best interests of the client(s) to designate Jessica M. Lujan,  
(name of local counsel)  
Attorney at Law, member of the State of Nevada and previously admitted to practice before the above-entitled Court as associate resident counsel in this action. The address and email address of said designated Nevada counsel is:

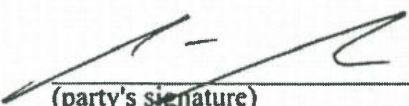
400 S. Fourth St., Third Floor,  
(street address)  
Las Vegas, Nevada, 89101,  
(city) (state) (zip code)  
(702) 791-0308, jlujan@nevadafirm.com.  
(area code + telephone number) (Email address)



1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes  
2 agreement and authorization for the designated resident admitted counsel to sign stipulations  
3 binding on all of us.  
4

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6  
7 The undersigned party(ies) appoint(s) Jessica M. Lujan as  
8 (name of local counsel)  
his/her/their Designated Resident Nevada Counsel in this case.

9  
10   
(party's signature)

11 Steven Sudell, President  
12 (type or print party name, title)

13  
14 (party's signature)

15  
16 (type or print party name, title)

17 **CONSENT OF DESIGNEE**

18 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

19   
20 Designated Resident Nevada Counsel's signature

21 14913  
22 Bar number

jlujan@nevadafirm.com  
Email address

23 **APPROVED:**

24 Dated: this 17th day of March, 2020.

25   
26 UNITED STATES DISTRICT JUDGE  
27  
28

CERTIFICATE OF GOOD STANDING

UNITED STATES DISTRICT COURT

District of Utah

I, D. Mark Jones, Clerk of the United States District Court, District of Utah, certify that

Brian N. Platt

Bar # 17099, was duly admitted to practice in this Court on May 14, 2019, and is in good standing as a member of the bar of this Court.

Dated at Salt Lake City, Utah  
on January 9, 2020



D. Mark Jones

Clerk

*Nancy J. Lawrence*  
(By) Deputy Clerk





# **Certificate of Good Standing and No Disciplinary History**

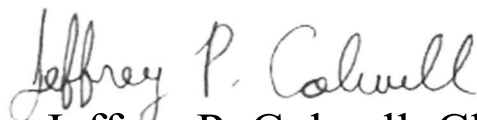
United States District Court  
District of Colorado

I, Jeffrey P. Colwell, Clerk of the United States District Court  
DO HEREBY CERTIFY

**BRIAN N PLATT**

was admitted to practice in this court on  
November 7, 2019  
and is in good standing with no disciplinary history.

Dated: February 4, 2020

  
Jeffrey P. Colwell, Clerk



# United States District Court

## Western District of Washington

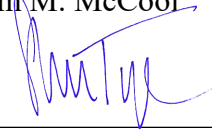


### CERTIFICATE OF GOOD STANDING

I, William M. McCool, Clerk of the United States District Court for the Western District of Washington, do hereby certify that BRIAN NELSON PLATT was admitted to practice in said Court on December 4, 2003 to the Western District of Washington, and is in good standing as a member of the bar of said Court.

Dated at Seattle, Washington on January 4, 2020.

William M. McCool  
Clerk

By   
Deputy Clerk



# ***CERTIFICATE OF GOOD STANDING***

\*This document expires 60 days from the date of issuance\*

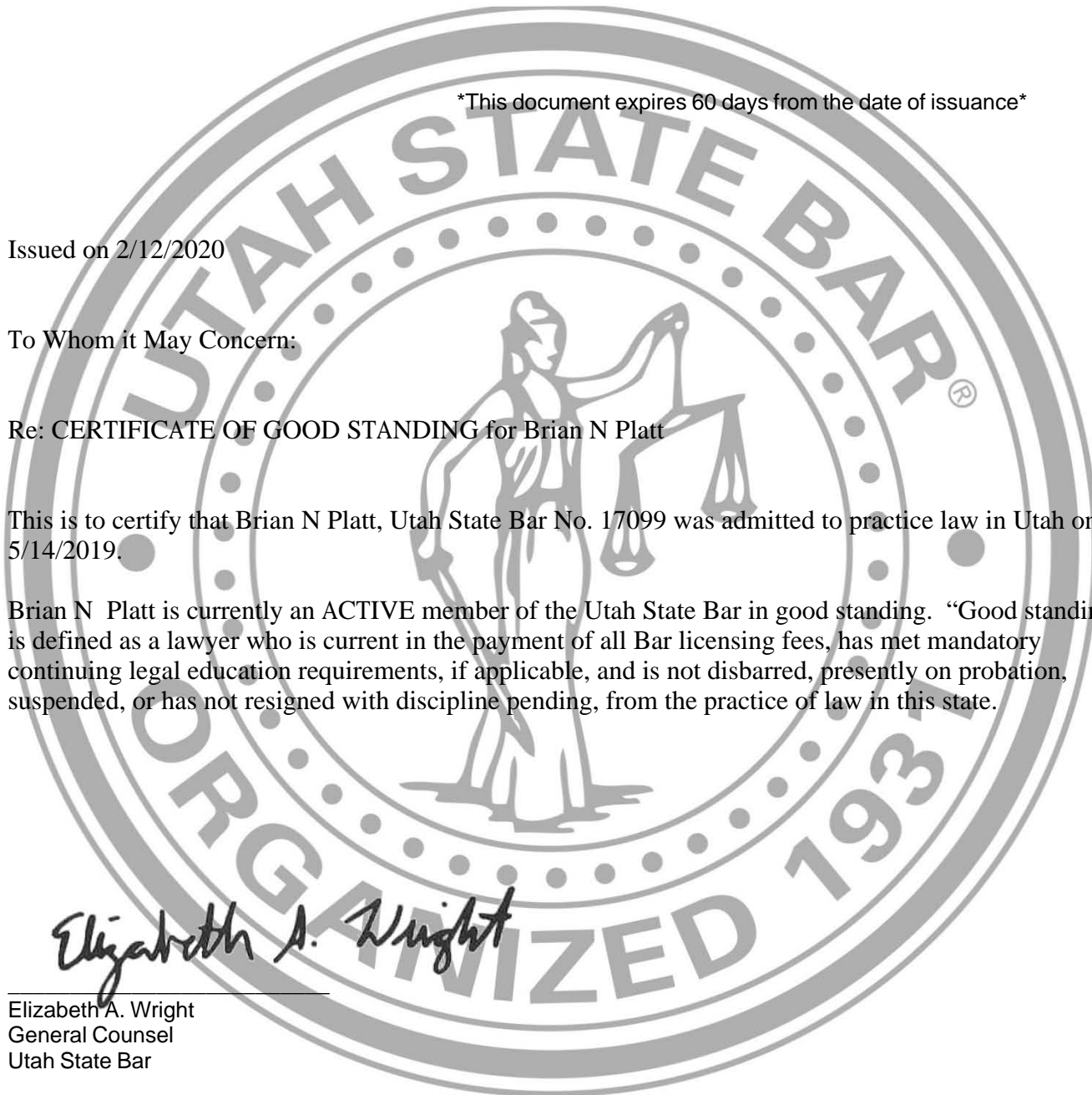
Issued on 2/12/2020

To Whom it May Concern:

Re: CERTIFICATE OF GOOD STANDING for Brian N Platt

This is to certify that Brian N Platt, Utah State Bar No. 17099 was admitted to practice law in Utah on 5/14/2019.

Brian N Platt is currently an ACTIVE member of the Utah State Bar in good standing. "Good standing" is defined as a lawyer who is current in the payment of all Bar licensing fees, has met mandatory continuing legal education requirements, if applicable, and is not disbarred, presently on probation, suspended, or has not resigned with discipline pending, from the practice of law in this state.



*Elizabeth A. Wright*

Elizabeth A. Wright  
General Counsel  
Utah State Bar

# CERTIFICATION OF CURRENT STATUS

February 21, 2020

## TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the Washington State Bar Association, **Mr. Brian Nelson Platt**, license no. **34089** was licensed or admitted to the practice of law as a lawyer in this state by the Washington Supreme Court on **November 6, 2003** and is, as of the date of this certificate, a(n) **Active lawyer** of the Washington State Bar Association who is **Eligible** to practice law in this state as a lawyer.

This certificate reflects the date of admission or licensure and the license status as of the date stated. Historical information about status, including periods on inactive status, administrative and disciplinary suspensions, disbarments, resignations, etc., are not reflected in this information, but are available through a Status History Certificate. A summary of confidential grievances and public discipline imposed is available, if authorized by the member, through a Discipline History Certificate.



Terra Nevitt  
Interim Executive Director

Washington State Bar Association  
1325 Fourth Ave, Suite 600  
Seattle, WA 98101-2539  
206-443-WSBA